COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF THE UNION LIGHT, HEAT AND POWER COMPANY, COVINGTON, KENTUCKY, TO DEVIATE FROM COMMISSION REGULATION 807 KAR 5:022, SECTION 8	))))	CASE NO. 10047

O R D E R

On September 23, 1987, The Union Light, Heat and Power Company ("ULH&P"), Covington, Kentucky, filed a letter with the Commission requesting authority to use a "four pointing" test instead of pilot burner test in its gas meter shop.

The Commission will treat this letter as an application requesting authority to deviate from the provisions of Commission Regulation 807 KAR 5:022, Section 8(3)(a)(1).

On October 23, 1987, Denis Hildenbrand and Fuad Sharifi of the Commission Staff inspected ULH&P's gas meter shop to ratify the process of the four pointing test.

ULH&P's gas meter shop receives approximately 400,000 positive displacement meters yearly for testing and maintenance. Nearly half of the meters are tin cased meters and the remaining are mainly aluminum cased meters. About 30 percent of the tin cased meters are condemned due to case or diaphragm damage. The condemned tin cased meters are replaced by the aluminum cased meters.

The meters are tested for accuracy of registration and for leaks by Bell Provers. Two proving runs are carried out, one at

open flow rate and the other at check flow rate. ULH&P provers are equipped with photohelic pressure gauges that detect and display significant leaks.

The meter that passes the prover's test is considered to be adequate for being placed in service for another 10 years. The meter that fails the prover's test is disassembled and repaired. The repaired meter is tested for internal leaks by the four pointing test at 3 inches water vacuum and then sealed and retested on a prover to determine its accuracy of registration. The tightness of the meter casing is tested hydro-pneumatically at 3 psig for a tin case meter and at 5 psig for an aluminum case meter.

Commission regulations 807 KAR 5:022, Section 8(3)(a)(1), state, "A pilot test to determine that the meter will register at one-half (1/2) of one (1) percent of the rated capacity . . .." However, the pilot test has two functions: first, to detect internal leaks; and second, to determine whether the meter registers the passage of small volumes of gas.

The four pointing test is adequate for detecting internal leaks in meters but does not test for the passage of small volumes of gas through the meter.

Since most internal leaks in a meter are not registered on its register index, the Commission is of the opinion that it is to the benefit of ULH&P to detect the small passage of gas and have it registered on the indices of its meters. But since the pilot test is time consuming, extra cost is required to perform this test by an additional number of laborers and equipment which it

seems, for ULH&P, does not justify the expected losses of gas from its system.

The Commission is concerned about the small leaks that might occur in the casing of meters and advises ULH&P to perform a hydro-pneumatic test on all casings of the meters.

FINDINGS AND ORDERS

The Commission, having considered the application and all evidence of record and being fully advised, is of the opinion and finds that:

1. A hearing to consider the merits of the application will not be necessary.

2. The four pointing test performed by ULH&P is adequate for detecting internal leaks in positive displacement meters.

3. ULH&P should be granted permission to use the four pointing test instead of pilot test, provided that leak tests are performed on all meters during proof testing by the provers.

4. ULH&P should perform a hydro-pneumatic leak test on meter casings.

IT IS THEREFORE ORDERED that:

1. ULH&P be and it hereby is granted authority to deviate from the Public Service Commission Regulation 807 KAR 5:022, Section 8(3)(a)(1), and shall use the four pointing test instead of pilot test.

2. ULH&P shall perform leak tests on all positive displacement meters by provers along with proof tests.

3. ULH&P shall carry out the hydro-pneumatic test on all meter casings.

Done at Frankfort, Kentucky, this 3rd day of November, 1987.

PUBLIC SERVICE COMMISSION

Chairman

Vice Chairman

Commissioner

ATTEST:

Executive Director